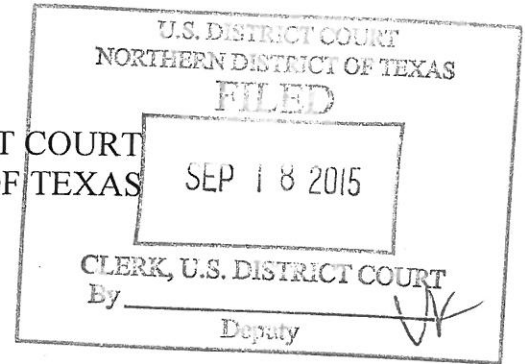


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

NO.

v.

JENNIFER LYNN DOUGHERTY

3-15-mj-677-BN

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, Brandon Leal, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

☒ Crime of violence (18 U.S.C. § 3156)

☐ Maximum sentence life imprisonment or death

☐ 10 + year drug offense

☐ Felony, with two prior convictions in above categories

☒ Serious risk defendant will flee

☐ Serious risk obstruction of justice

☒ Felony involving a minor victim

☐ Felony involving a firearm, destructive device, or any other dangerous weapon

\_\_\_\_\_ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

\_\_\_X\_\_\_ Defendant's appearance as required

\_\_\_X\_\_\_ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

\_\_\_\_\_ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

\_\_\_\_\_ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

\_\_\_X\_\_\_ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251, 2252, 2252A, 2423

\_\_\_\_\_ Previous conviction for "eligible" offense committed while on bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

\_\_\_X\_\_\_ At first appearance

\_\_\_\_\_ After continuance of 3 days (not more than 3).

DATED this 18th day of September, 2015.

Respectfully submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY



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CERTIFICATE OF SERVICE

I hereby certify that on **September 18, 2015**, I filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas. I do not know the attorney who will represent the defendant; however, I hereby certify that I will hand-deliver a copy of the foregoing document to the attorney or the defendant at the first available opportunity to do so.



CAMILLE E. SPARKS  
Assistant United States Attorney